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10 *Attorneys for Governor Joseph Lombardo  
and Attorney General Aaron D. Ford*

11  
12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 JANE DOE;

15 Plaintiff,

16 vs.

17 JOSEPH LOMBARDO, Governor of  
Nevada in his official capacity; AARON  
18 FORD, Attorney General of Nevada in his  
official capacity; NYE COUNTY; ELKO  
COUNTY; STOREY COUNTY; WESTERN  
19 BEST, INC, D/B/A CHICKEN RANCH;  
WESTERN BEST, LLC; DESERT ROSE  
CLUB, LLC; HACIENDA ROOMING  
20 HOUSE, INC. D/B/A BELLA'S  
HACIENDA RANCH; MUSTANG RANCH  
21 PRODUCTIONS, LLC D/B/A MUSTANG  
RANCH LOUNGE, LLC; LEONARD  
22 "LANCE" GILMAN in his official capacity;  
and LEONARD "LANCE" GILMAN, in his  
23 individual capacity,

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25 Defendant(s).

Case No. 3:24-cv-00065-MMD-CLB

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**ORDER GRANTING STIPULATION  
AND [PROPOSED] ORDER FOR  
STATE DEFENDANTS TO FILE A  
REPLY IN SUPPORT OF THE  
MOTION TO DISMISS THE  
COMPLAINT PURSUANT TO FRCP  
12(B)(1), 12(B)(6), 8(A) OR IN THE  
ALTERNATIVE, MOTION TO  
STRIKE THE COMPLAINT FOR  
VIOLATION OF FRCP 12(F) [ECF  
NO. 24]  
[SECOND REQUEST]**

COME NOW Defendants Governor Joseph Lombardo ("Governor Lombardo") and Attorney General Aaron D. Ford ("General Ford"), (collectively, "State Defendants"), by and

1 through their counsel, and Plaintiff Jane Doe, by and through her counsel of record, and  
2 hereby stipulate and agree to the following regarding State Defendants' Reply to Plaintiff's  
3 Opposition [ECF No. 63] to State Defendants' Motion to Dismiss [ECF No. 24]:

- 4 1. This is State Defendants' second request for extension of time to file a Reply to  
5 Plaintiff's Opposition to State Defendants' Motion to Dismiss [ECF No. 24];
- 6 2. The parties previously agreed for State Defendants to have an extension of 21-  
7 days to file and serve their Reply to Plaintiff's Opposition [ECF No. 63] to State  
8 Defendants' Motion to Dismiss [ECF No. 24], once filed, *see* [ECF No. 44], which  
9 this Honorable Court granted on April 12, 2024 [ECF No. 47].
- 10 3. Per the parties' prior agreement and the Court's order [ECF No. 47], the Reply to  
11 Plaintiff's Opposition to State Defendants' Motion to Dismiss is due May 28, 2024.
- 12 4. The parties have amicably agreed to allow State Defendants an additional one-  
13 week extension to file their Reply to Plaintiff's Opposition to State Defendants'  
14 Motion to Dismiss, making the new due date **June 4, 2024**.

15 This extension is not sought for an improper purpose or to cause unnecessary delay.  
16 Good cause for the extension exists provided the numerous legal issues requiring  
17 appropriate and adequate response, the importance of the issues presented, and the  
18 numerosity of parties necessitating multiple levels of review. It is within the discretion of  
19 the Court to grant an extension of time. *See, e.g., Ahanchian v. Xenon Pictures, Inc.*, 624  
20 F.3d 1253, 1258 (9th Cir. 2010). Based on the foregoing, there is good cause to extend the  
21 deadline for State Defendants to file their Reply to Plaintiff's Opposition to State  
22 Defendants' Motion to Dismiss to **June 4, 2024**.

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1 **IT IS SO STIPULATED**

2 DATED this 24th day of May, 2024.

3 GUINASSO LAW

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5 By: /s/ Jason D. Guinasso  
6 Jason D. Guinasso Esq.  
7 Nevada Bar No.: 8478  
8 Attorney for Plaintiff

DATED this 24th day of May, 2024.

AARON D. FORD  
Attorney General

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11 By: /s/ Iva K. Todorova  
12 Iva K. Todorova (Bar. No. 15827)  
13 Senior Deputy Attorney General  
14 Attorneys for Governor Joseph  
15 Lombardo and Attorney General  
16 Aaron D. Ford

17 **ORDER**

18 Based on the foregoing stipulation, and good cause appearing:

19 **IT IS HEREBY ORDERED** that State Defendants shall have an extension of one  
20 week to file and serve their Reply to Plaintiff's Opposition [ECF No. 63] to State  
21 Defendants' Motion to Dismiss [ECF No. 24], making the new deadline **June 4, 2024**.

22 **IT IS SO ORDERED.**

23 Date this 24th day of May, 2024.



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28 U.S.DISTRICT JUDGE

Respectfully submitted by:

AARON D. FORD  
Attorney General

By: /s/ Iva K. Todorova  
Iva K. Todorova (Bar No. 15827)  
Senior Deputy Attorney General  
Attorneys for Governor Joseph Lombardo and  
Attorney General Aaron Ford